

### REMARKS

Applicant has carefully reviewed and considered the Office Action mailed on April 1, 2002, and the references cited therewith.

Claims 1, 6, 7, 13, 17, 23, and 27-29 are amended, claims 33-35 are added; as a result, claims 1-7, 13, 17-29, and 33-35 are now pending in this application.

#### *§103 Rejection of the Claims*

Claims 1-7, 13, and 17-29 were rejected under 35 USC § 103(a) as being unpatentable over Duvvury et al. (U.S. Patent No. 5,493,133).

Claim 1 recites a device comprising a substrate, a first doped region formed in the substrate, and a second doped region formed in the substrate, in which the second doped region is separated from the first doped region by "only" the substrate region. Duvvury does not disclose this feature. Duvvury discloses, in Figure 2, a device that includes a diffused region 52 and a diffused region 54. These diffused regions are "not" separated "only" by a substrate region. Diffused region 52 and diffused region 54 are separated by a field oxide region 46, see also the text, column 2, lines 41-43. Since Duvvury does not disclose the feature recited by claim 1, the device of claim 1 is different from the device of Duvvury. Therefore, Applicant believe that claim 1 is patentable over Duvvury.

Further, Duvvury discloses a device having a different structure from the structure of the device of claim 1. And Duvvury does not teach or suggest the device of claim 1. Duvvury discloses a device that includes a combination of three elements: a lateral PNP, a silicon-controlled rectifier, and a vertical PNP, see Figure 2, elements 58, 60, and 62. The structure of the device of claim 1 does not includes a combination of a lateral PNP, a silicon-controlled rectifier, and a vertical PNP. Based on the differences between the device of Duvvury and the device of claim 1, and based on the absence of teaching or suggestion by Duvvury to make the device of claim 1, Applicant believes that claim 1 is not obvious over Duvvury. Accordingly, Applicant requests that the rejection of claim 1 be reconsidered and withdrawn and that claim 1 be allowed.

Dependent claims 2-5 depend on claim 1 and are believed to be patentable over Duvvury for similar reasons, plus the elements in the dependent claims. Therefore, Applicant requests that the rejection of claims 2-5 be reconsidered and withdrawn and that claims 2-5 be allowed.

Claims 6, 7, 13, 17, and 27 recite similar elements as that of claim 1. In light of the reasons presented regarding claim 1, Applicant believes that claims 6, 7, 13, 17, and 27 are patentable over Duvvury. Therefore, Applicant requests that the rejection of claims 6, 7, 13, 17, and 27 be reconsidered and withdrawn and that claims 6, 7, 13, 17, and 27 and the claims depending on these claims be allowed.

Claims 23-26 and 28 were rejected under 35 USC § 103(a) as being unpatentable over Duvvury et al. in view of Maekawa (U.S. Patent No. 6,163,056).

Claims 23-26 and 28 recite similar elements as that of claim 1. In light of the reasons presented regarding claim 1, Applicant believes that claims 23-26 and 28 are not obvious over Duvvury for similar reasons. Maekawa does not disclose or suggest the elements of claims 23-26 and 28 that are similar to the elements of claims 1. Since claims 23-26 and 28 are not obvious over Duvvury and since Maekawa does not disclose or suggest the elements of claims 23-26 and 28 that are similar to the elements of claims 1, Applicant believes that claims 23-26 and 28 are patentable over Duvvury in view of Maekawa. Accordingly, Applicant requests that the rejection of claims 23-26 and 28 be reconsidered and withdrawn and that claims 23-26 and 28 be allowed.

**CONCLUSION**

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney at (612) 373-6969 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

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6.26.02

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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Commissioner of Patents, Washington, D.C. 20231, on this 29 day of June, 2002.

Name

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